Mackenzie Valley Review Board

July 8, 2026

Kelli Gillard
Manager, Impact Assessment
Nunavut Impact Review Board

Via email: kgillard@nirb.ca;
apourmahabadian@nirb.ca

RE: Information Requests for West Kitikmeot Resources Corporation's Grays Bay Road and Port Project Proposal (NIRB File No. 24XN038; MVEIRB File No. OBD2526-01)

Dear Kelli Gillard,

The Mackenzie Valley Environmental Impact Review Board (MVEIRB) reviewed the Impact Statement submitted by West Kitikmeot Resources Corp. for the proposed Gray's Bay Road and Port Project with a focus on transboundary impacts. MVEIRB collaborated with NIRB on its information requests related to transboundary effects. Please see our additional information requests below.

If you have questions or require further information, please contact Catherine Fairbairn, Senior Environmental Assessment Advisor, at cfairbairn@reviewboard.ca, and Clémentine Bouche, Environmental Assessment Advisor, at cbouch@reviewboard.ca.

Respectfully,

X Clémentine Bouche

Clémentine Bouche

Environmental Assessment Advisor

Mackenzie Valley Review Board

OBD2526-01

July 8, 2026

Grays Bay Road and Port
MVEIRB's Information Requests

No	VEC(s)	Topic	To	Reference	Preamble/ Concern	Information Request

1	n/a	Induced Development	West Kitikmeot Resources	Volume 10 Section 32	In the Impact Statement, WKR presents a **foreseeable development scenario** (including the Arctic Security and Economic Corridor, the NICO mine, and the Courageous Lake Mine), and a **reasonably foreseeable induced development scenario** including three mines (Izok, Hackett, and High Lake), the extension of the Grays Bay road from Jericho Station to the Northwest Territories border, and the expansion of the Grays Bay airstrip and fuel storage facilities.
					
					The IS does not provide much detail about the reasonably foreseeable induced scenario, making it difficult to understand how it contributes to cumulative and transboundary impacts.
						• Please describe the foreseeable and reasonably foreseeable induced development scenarios in more detail. Provide a table that includes:
						  ○ Each foreseeable and reasonably foreseeable induced activity
						  ○ Conceptual design or activity envelope, including the development's footprint (area disturbed, pits, waste rock, tailings), and associated infrastructure (airstrips, camps, roads, power generation, etc.)
						  ○ shipping and supply routes
						  ○ road alignments (new access roads, upgrades, connections to Grays Bay Road and Port or Tibbit to Contwoyto Winter Road)
						  ○ corridor widths and right-of-way clearing
						  ○ workforce assumptions
						  ○ disturbance assumptions

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						○ affected transboundary VCs (including VCs not predicted to experience transboundary effects in the IS) ○ receptor jurisdictions and Indigenous groups ○ project-only versus cumulative effects ○ sensitivity analysis for low, base, and high development cases
2	n/a	Induced Development Vehicle Traffic	West Kitikmeot Resources	Volume 10, Section 32 and 33	On page 32-12, there is a reference to an addition of 1000 vehicles due to induced development (RFI operations). But in other places (for example, pages 33-13, 33-29), the 1000 vehicles on the Tibbitt to Contwoyto Winter Road are referred to as project traffic during construction (reducing to 30/year in operations). It is unclear why WKR is predicting the same number of vehicles on the Tibbitt to Contwoyto Winter Road during construction and in the induced development scenario.	• Clarify how many additional vehicles are predicted to use the Tibbitt to Contwoyto Winter Road during construction, and in the assessed induced development scenario (RFI scenario of Izok, Hackett, High Lake mines). Please describe how this number was reached and what percentage increase it represents compared to today. • How does WKR predict that the Arctic Economic Security Corridor would affect traffic if constructed? Would more traffic travel in from the NWT rather than barging to NU?
3	Infrastructure and Services	NWT winter roads	West Kitikmeot Resources	Volume 2 Volume 10, Section 33	The IS highlights that in the future, NU and the NWT will be linked via the Arctic Economic and Security Corridor (all-season road from Yellowknife to the NU/NT border) and Grays Bay Road and Port Phase 2 (all-season road from Jericho Station to the NU/NT border) (Vol 9, p.29-59). However, the IS is unclear on how the Grays Bay Road and Port will be linked to Yellowknife before these two all-season roads (which are considered as induced developments) may be built. First, the Tibbitt to Contwoyto Winter Road is currently built and operated as a joint venture between mining companies, but these mines are planning to close in the next few years (before	What does WKR plan to do if the licence of occupation is not renewed beyond 2033, and mining companies stop building and operating this road before the Grays Bay Road is finalized? Please clarify who will be responsible for building and operating the Tibbitt to Contwoyto Winter Road between the mines and Contwoyto Lake, considering that the joint venture is not currently building it. Please provide more information on all segments of the all-season and winter roads required for project materials to travel from the NWT. This includes alignments, alignment alternatives, maps, and construction timelines, and how NWT parties' comments were considered for: - Jericho Station to Contwoyto Lake - Contwoyto Lake to the NU/NT border

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					2030 for Diavik and before 2040 for Ekati). The licence of occupation expires in 2033, and the land use permit expires in 2031. Yet, the IS shows that the Grays Bay Road and Port depends on the Tibbitt to Contwoy to Winter Road and the 'new winter road' for the transport of materials from Yellowknife **during** construction (Vol 10, p.33-29). Construction of the Grays Bay Road is expected to begin from Jericho Station in 2030, with resupply coming from the Tibbitt to Contwoyto Winter Road in 2031, continuing through 2035 (Vol 2, p.2-37). The Tibbitt to Contwoyto Winter Road may no longer exist before the Grays Bay Road is constructed. Second, the current end of the Tibbitt to Contwoyto Winter Road is at the North end of Contwoyto Lake. However, the joint venture does not annually construct the road all the way to Contwoyto, but rather to the Diavik and Ekati diamond mines (Tibbit to Contwoyto Winter Road). Third, the IS indicates that WKR plans to construct and operate a three kilometer road between Jericho Station and the end of the Tibbitt to Contwoyto Winter Road on Contwoyto Lake, which has two possible alignments. (Vol 2, p.2-42). There is no map showing the two alignments. There is also little information on how the NWT parties have been engaged regarding this new road segment, and how their comments have been integrated into the winter road's design and location.	- NU/NT to the current end of the TCWR Please clarify how the construction and operation of the road segment between the NU/NT border and the current end of the Tibbitt to Contwoyto Winter Road (at the diamond mines) may cumulatively affect all VECs considered in the transboundary impact assessment. These impacts may be more substantial than impacts from the current Tibbitt to Contwoyto Winter Road.

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4	Infrastructure and Services	Cumulative impacts of the use of infrastructure and services in the Mackenzie Valley	West Kitikmeot Resources	Volume 9 Volume 10, Sections 32 and 33	The transboundary effects assessment in section 33 is very high level. It does not always clearly describe the predicted impacts and is inconsistent in how it considers cumulative impacts. It identifies potential pressures on infrastructure and services outside Nunavut (e.g., Yellowknife) but provides limited detail on specific capacity limitations.	• Provide detailed estimates of project-related demand on: ○ transportation systems (e.g., winter road, air transport) ○ health and emergency services ○ Yellowknife's landfill (compare the project-related demand to: a) the current disposal rate, b) the current capacity of the facility, and c) the future capacity of the facility, for the duration of the project) ○ worker movement and service use outside Nunavut. Estimate temporary accommodation demands during work rotation. ○ expected increase in aircraft use of NWT air infrastructure during project construction and operations. Compare estimates to the airports' current and future capacity. • Describe how these demands on infrastructure and services were considered in assessing transboundary significance. • Describe how any predicted impacts related to the above could interact with cumulative impacts from induced projects. • Identify which parts of, or groups in, the Mackenzie Valley are more likely to experience transboundary effects (e.g., specific communities, regions, or user groups).
5	n/a	Transboundary Impact Assessment	West Kitikmeot Resources	Volume 10, Section 33	• The Transboundary section of volume 10 does not consistently describe impact characteristics (such as duration, magnitude, direction) or how cumulative impacts may contribute to existing impacts. MVEIRB requires additional information to fully understand how WKR predicts its	• For transboundary impacts, please provide tables that outline the potential impact pathways and characterize any residual effects (including direction, magnitude, geographic extent, timing, duration, frequency, and reversibility). • Describe any of these impacts that may add to cumulative impacts.

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					project and cumulative impacts could contribute to transboundary impacts in the Mackenzie Valley.	*This IR can be answered in conjunction with NIRB's first IR regarding transboundary effect pathways.*
6	Caribou	Transboundary Caribou Impacts in the Mackenzie Valley	West Kitikmeot Resources	Volume 10, Section 33 Volume 6, Section 16.6	The Impact Statement describes potential short-term effects on Bathurst caribou herd movement and cumulative pressures, but provides little explanation of long-term changes in light of these cumulative pressures. For instance, WKR provides a population trajectory over a hypothetical ten-year period with an initial population size of 10,000 animals. However, the current population sits at just over 6,000 individuals, and the project and its induced projects will exist for many more years, not just ten years. (Vol 6, p.16-155). In addition, the IS predicts that the impacts of climate change and developments (including the Grays Bay Road and Port and Slave Geological Province Corridor, but not the three induced (RFI) mines in Nunavut) will lead to an annual 12% population decline. Considering that the Bathurst herd already is at a 98% decline since 1986, reviewers need more information on what this 12% decline means for the survival of the herd.	• Include an assessment of cumulative effects of transboundary impacts on caribou that includes not only foreseeable and reasonably foreseeable induced projects but also hypothetical projects (as defined in Vol 10, p.32-5). How does that change affect WKR's conclusion about transboundary impacts on caribou? ○ Based on this cumulative effects assessment, does WKR predict a possible change in migration routes for the Bathurst herd? • Evaluate the different population trajectory (mentioned on p.16-155) over 50 years instead of 10 years. Include reasonably foreseeable induced developments and hypothetical projects in the evaluation. • Provide evidence demonstrating the effectiveness of proposed mitigation measures specifically for migratory caribou under population stress. Additionally, clarify how measures are protecting the calving grounds during the calving season, and the post-calving range in the post-calving season. • How were significance thresholds and levels of acceptable uncertainties adjusted (if at all) to reflect a herd that has already experienced extreme population decline? WKR should use a precautionary approach to predicting significance: when the risk of serious harm to the VC is clear from the evidence, even with uncertainties, a low significance threshold should be applied. • The IS mentions that under the predicted future climate combined with development, population would decline by 12% annually, with calf mortality reaching 73% annually. How do these numbers add to the existing 98% decline of the herd?

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7	n/a	Indigenous Knowledge across borders	West Kitikmeot Resources	Volume 3, Section 4-6 Volume 10, Section 33 Table 33.1 Appendix 6C	Although the Project is in Nunavut, there is clear potential for transboundary and cumulative impacts in the Mackenzie Valley. The Impact Statement provides detailed records of engagement and in each section describes the influence of engagement and Inuit, Indigenous, and community knowledge on the assessment. However, for Indigenous Governments and Organizations outside of Nunavut, much of this information is vague and non-specific. Reviewing Appendix 6C shows that much of the engagement with these groups was limited to recent notification letters, introductory meetings, or general discussions about the project. Table 33.1 summarizes Inuit, Indigenous, and Community Knowledge and Engagement feedback, but much of the information in it is concerns raised by community members. It is not entirely clear to MVEIRB how WKR sought Traditional and Community Knowledge from Mackenzie Valley groups, or how knowledge from Mackenzie Valley groups specifically informed WKR's transboundary effects assessment.	• Describe in more detail the types, frequency and timing of opportunities that were provided for Mackenzie Valley Indigenous Governments and Organizations to provide Indigenous Knowledge (beyond general community concerns) to inform both project development and impact assessment. • Describe in more detail any Indigenous or Community information from these groups that was incorporated into the effects assessment, or that influenced how the transboundary assessment was completed.